

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK**

Association of Jewish Camp Operators,)
)
Samuel Werzberger, MD, FAAP,)
)
Ariela Orkaby, MD, MPH,)
)
Beth Statfeld,)
)
Gail Zahtz,)
)
Plaintiffs,)
)
v.)
)
Andrew M. Cuomo, Governor of the)
State of New York, in his official capacity,)
)
Defendant.)
_____)

Case No. 1:20-CV-0687 (GLS-DJS)

DECLARATION OF JEFFREY P. HENDERSON, MD, PHD

Pursuant to 28 U.S.C. § 1746, I, Jeffrey P. Henderson, MD, PhD, hereby declare as follows:

1. I am a physician licensed by the Medical Board of the State of Missouri since 2006. I received my Doctor of Medicine degree and my PhD in Molecular Biophysics from Washington University School of Medicine, St. Louis in 2002. I completed my residency and fellowship at the Barnes-Jewish Hospital at Washington University School of Medicine. I am Board certified in infectious diseases and internal medicine.


2. I am an Associate Professor of Medicine and Molecular Microbiology at Washington University School of Medicine in St. Louis. I also serve as the co-director of the Biochemistry, Biophysics and Structural Biology Graduate Program in the Division of Biology and Biomedical Sciences. I offer this medical opinion on behalf of myself and not on behalf of the Washington University School of Medicine in St. Louis.

3. In my current medical practice, I care for hospitalized infectious diseases inpatients at different stages of COVID-19 infection and participate in national level efforts to make convalescent plasma available as a therapeutic option. These activities have required me to become familiar with the emerging literature on COVID-19 transmission and risk.

4. I understand that New York Governor Cuomo has refused to permit overnight camps to operate this summer in New York, while he concurrently has allowed similar entities, such as higher education, summer day camps, and child care programs, to open provided they adhere to certain health protocols developed by the New York State Department of Health. I have reviewed these protocols, and I am familiar with the typical setting of overnight camps.

5. It is my medical opinion that overnight camps would be as safe as higher education, day camps, and child care programs, provided the overnight camps adhere to the health protocols that the Department of Health has issued for those activities.

Executed June 30, 2020


Jeffrey P. Henderson, MD, PhD